

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-60023-CR-SINGHAL/STRAUSS

18 U.S.C. § 1956(h)

18 U.S.C. § 982(a)(1)

FILED BY AT D.C.

Feb 1, 2024

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

UNITED STATES OF AMERICA

vs.

MONIQUE C. CLARKE,
a/k/a Monique C. Clark-Mootoo,
a/k/a Rebecca White, and
a/k/a Mark Hilton, and
JON-MICHAEL HUDSON,

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

The Defendant and Related Entities

1. **MONIQUE C. CLARKE** was a resident of Broward County, Florida.
2. **JON-MICHAEL HUDSON** entered the United States, Broward County, Florida, from Jamaica on or about September 28, 2020, and returned to Jamaica from Broward County, Florida, on or about June 16, 2021.
3. **MONIQUE C. CLARKE** incorporated Paradigm the Brand, Inc. ("Paradigm the Brand") on or about October 25, 2018, and she was listed as its president. At the time of incorporation, Paradigm the Brand's listed principal place of business was 4821 E. Pacific Point Avenue, Apt 205, Lauderdale Lakes, Florida.

The Bank Accounts

4. **MONIQUE C. CLARKE** established and controlled bank accounts for herself and Paradigm the Brand at the following banks:

a. On or about January 28, 2019, **MONIQUE C. CLARKE** established a bank checking account ending in 0700 at TD Bank in her name;

b. On or about July 29, 2019, **MONIQUE C. CLARKE** established a bank business checking account ending in 4042 at TD Bank for Paradigm the Brand;

c. On or about May 11, 2020, **MONIQUE C. CLARKE** established a bank savings account ending in 0490 at TD Bank in her name;

d. On or about December 16, 2020, **MONIQUE C. CLARKE** established a bank business checking account ending in 3108 at Chase Bank for Paradigm the Brand.

5. **MONIQUE C. CLARKE** was the sole, authorized signer for all the above-described bank accounts.

Residence Receiving Cash Shipments

6. On or about July 31, 2020, **MONIQUE C. CLARKE** leased an apartment at 700 SW 78th Ave, Apt. 1201, Plantation, Florida under the alias "Rebeca White."

7. On or about August 1, 2020, **MONIQUE C. CLARKE** created an account with the parcel locker system for that residence under the name of "Rebecca White." The account also listed the names "Monique Clarke" and "Mark Hilton." **JON-MICHAEL HUDSON** also had access to the parcel locker system.

8. From on or about October 17, 2020, through January 21, 2021, **MONIQUE C. CLARKE**, under the alias "Mark Hilton," received parcels containing United States currency at the parcel locker system located at 700 SW 78th Ave, Apt. 1201, Plantation, Florida.

COUNT 1

**Conspiracy to Commit Money Laundering
(18 U.S.C. § 1956(h))**

1. The General Allegations section of this indictment are re-alleged and incorporated by reference as if fully set forth herein.

2. From at least as early as in or around October 2020, and continuing through in or around January 2021, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**MONIQUE C. CLARKE,
a/k/a Monique C. Clark-Mootoo, a/k/a Rebecca White, and a/k/a Mark Hilton, and
JON-MICHAEL HUDSON,**

did knowingly combine, conspire, confederate, and agree with each other and other persons, both known and unknown to the Grand Jury, to commit certain offenses against the United States, in violation of Title 18, United States Code, Sections 1956 and 1957, that is,

3. to knowingly conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, knowing that the transaction was designed in whole and in part to:

(a) conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) avoid a transaction reporting requirement under State and Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii);

4. transport, transmit and transfer funds to a place outside the United States from a place inside the United States, knowing that the funds involved in the transportation, transmission

and transfer represented the proceeds of some form of unlawful activity, and knowing that the transportation, transmission and transfer was designed in whole and in part to:

(a) conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i);

5. to knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349, and wire fraud in violation of 1343.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, **MONIQUE C. CLARKE** and **JON-MICHAEL HUDSON**, have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1956(h), as alleged in this Indictment, the defendants shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

All pursuant to Title 18, United States Code, Section 982(a)(1), and the procedures set forth

in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

FOREPERSON

 BRUCE D. BROWN

for MARKENZY LAPOINTE
UNITED STATES ATTORNEY


JOSEPH A. COOLEY
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: _____

v.

CERTIFICATE OF TRIAL ATTORNEY

MONIQUE C. CLARKE, et al.,

Defendants.**Court Division** (select one)☐ Miami☐ Key West☐ FTP☒ FTL☐ WPB**Superseding Case Information:**

New Defendant(s) (Yes or No) _____

Number of New Defendants _____

Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect: _____
4. This case will take 10 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I <input type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input checked="" type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) No
If yes, Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) _____
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shanick Maynard)? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) No
15. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

By: _____

Joseph A. Cooley

Assistant United States Attorney

FL Bar No. 966460

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Monique C. Clarke

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

Title 18, United States Code, Section 1956(h)

*** Max. Term of Imprisonment:** Twenty years

*** Mandatory Min. Term of Imprisonment (if applicable):** NA

*** Max. Supervised Release:** Three (3) years

*** Max. Fine:** \$500,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Jon-Michael Hudson

Case No: _____

Count #: 1

Conspiracy to Commit Money Laundering

Title 18, United States Code, Section 1956(h)

*** Max. Term of Imprisonment:** Twenty years

*** Mandatory Min. Term of Imprisonment (if applicable):** NA

*** Max. Supervised Release:** Three (3) years

*** Max. Fine:** \$500,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**